

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

JULIA HUBBARD et al., §
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Plaintiffs, §
§
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vs. § Civil Case No. SA-23-CV-00580-FB
§
TRAMMELL S. CROW. JR. et al., §
§
Defendants §

**DEFENDANT RCI HOSPITALITY HOLDINGS, INC.’S ANSWER AND
AFFIRMATIVE DEFENSES TO PLAINTIFFS’ AMENDED COMPLAINT
AND DEMAND FOR JURY TRIAL**

Defendant RCI Hospitality Holdings, Inc. (“Defendant”) files this Original Answer and Affirmative Defenses to Plaintiffs Julia Hubbard and Kayla Goedinghaus’s (collectively, “Plaintiffs”) Amended Complaint (ECF 190) (the “Complaint”) and Demand for Jury Trial. Defendant responds to each of the numbered paragraphs in the Complaint as follows:

1. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 1 of the Complaint.
2. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 2 of the Complaint.
3. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 3 of the Complaint.
4. To the extent the allegations in Paragraph 4 of the Complaint state or suggest that Defendant benefitted from the alleged “Venture” or that Defendant acted or omitted to act with a culpable mental state with respect to Plaintiffs, Defendant denies same. As to the remaining

allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

5. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 5 of the Complaint.

6. Defendant denies the allegations in Paragraph 6 of the Complaint that Defendant engaged in “misconduct,” “crimes,” an “illegal racketeering enterprise,” “various unlawful predicate acts,” and that Plaintiffs were proximately harmed by any such alleged activity. As to remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

7. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 7 of the Complaint.

8. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 8 of the Complaint.

9. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 9 of the Complaint.

10. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 10 of the Complaint.

11. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 11 of the Complaint.

12. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 12 of the Complaint.

13. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 13 of the Complaint.

14. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 14 of the Complaint.

15. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 15 of the Complaint.

16. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 16 of the Complaint.

17. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 17 of the Complaint.

18. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 18 of the Complaint.

19. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 19 of the Complaint.

20. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 20 of the Complaint.

21. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 21 of the Complaint.

22. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 22 of the Complaint.

23. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 23 of the Complaint.

24. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 24 of the Complaint.

25. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 25 of the Complaint.

26. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 26 of the Complaint.

27. To the extent the allegations in Paragraph 27 of the Complaint state or suggest that Defendant “enticed” anyone to “assist” the alleged “Venture,” Defendant denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

28. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 28 of the Complaint.

29. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 29 of the Complaint.

30. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 30 of the Complaint.

31. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 31 of the Complaint.

32. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 32 of the Complaint.

33. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 33 of the Complaint.

34. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 34 of the Complaint.

35. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 35 of the Complaint.

36. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 36 of the Complaint.

37. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 37 of the Complaint.

38. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 38 of the Complaint.

39. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 39 of the Complaint.

40. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 40 of the Complaint.

41. To the extent the allegations in Paragraph 41 of the Complaint state or suggest that Defendant “benefit[ted] by labor trafficking Hubbard,” Defendant denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

42. Defendant denies the allegations in Paragraph 42 of the Complaint that it “benefitted by knowingly receiving the labor of Hubbard through means of force, threats of force, physical restraint, serious harm, or threats of such means.” As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

43. Defendant denies the allegations in Paragraph 43 of the Complaint that it owned or owns a Dallas, Texas gentlemen’s club named Silver City Cabaret. As to the remaining

allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

44. Defendant denies the allegations in Paragraph 44 of the Complaint that it had knowledge of the alleged misconduct by Casey Grover. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

45. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 45 of the Complaint.

46. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 46 of the Complaint.

47. Defendant denies the allegations in Paragraph 47 of the Complaint that Defendant owned or owns clubs called "XTC" or "Temptations." As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

48. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 48 of the Complaint.

49. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 49 of the Complaint.

50. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 50 of the Complaint.

51. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 51 of the Complaint.

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58. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 58 of the Complaint.

59. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 59 of the Complaint.

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61. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 61 of the Complaint.

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70. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 70 of the Complaint.

71. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 71 of the Complaint.

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80. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 80 of the Complaint.

81. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 81 of the Complaint.

82. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 82 of the Complaint.

83. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 83 of the Complaint.

84. Defendant denies the allegations in Paragraph 84 of the Complaint.

85. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 85 of the Complaint.

86. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 86 of the Complaint.

87. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 87 of the Complaint.

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223. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 223 of the Complaint.

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226. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 226 of the Complaint.

227. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 227 of the Complaint.

228. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 228 of the Complaint.

229. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 229 of the Complaint.

230. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 230 of the Complaint.

231. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 231 of the Complaint.

232. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 232 of the Complaint.

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241. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 241 of the Complaint.

242. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 242 of the Complaint.

243. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 243 of the Complaint.

244. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 244 of the Complaint.

245. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 245 of the Complaint.

246. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 246 of the Complaint.

247. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 247 of the Complaint.

248. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 248 of the Complaint.

249. To the extent the allegations in Paragraph 249 of the Complaint state or suggest that Defendant labor-trafficked Julia Hubbard, Defendant denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

250. Defendant (misnamed as “RCI Entertainment, Inc.”) denies the allegations in Paragraph 250 of the Complaint that it owned a Dallas, Texas gentlemen’s club named “Silver

City Cabaret." As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

251. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 251 of the Complaint.

252. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 252 of the Complaint.

253. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 253 of the Complaint.

254. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 254 of the Complaint.

255. Defendant denies the allegation that Richard Butler is the owner of Silver City Cabaret. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

256. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 256 of the Complaint.

257. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 257 of the Complaint.

258. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 258 of the Complaint.

259. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 259 of the Complaint.

260. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 260 of the Complaint.

261. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 261 of the Complaint.

262. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 262 of the Complaint.

263. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 263 of the Complaint.

264. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 264 of the Complaint.

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270. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 270 of the Complaint.

271. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 271 of the Complaint.

272. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 272 of the Complaint.

273. Defendant denies the allegations in Paragraph 273 of the Complain that it owned clubs called “XTC” or “Temptations.” As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

274. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 274 of the Complaint.

275. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 275 of the Complaint.

276. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 276 of the Complaint.

277. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 277 of the Complaint.

278. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 278 of the Complaint.

279. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 279 of the Complaint.

280. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 280 of the Complaint.

281. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 281 of the Complaint.

282. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 282 of the Complaint.

283. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 283 of the Complaint.

284. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 284 of the Complaint.

285. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 285 of the Complaint.

286. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 286 of the Complaint.

287. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 287 of the Complaint.

288. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 288 of the Complaint.

289. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 289 of the Complaint.

290. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 290 of the Complaint.

291. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 291 of the Complaint.

292. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 292 of the Complaint.

293. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 293 of the Complaint.

294. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 294 of the Complaint.

295. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 295 of the Complaint.

296. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 296 of the Complaint.

297. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 297 of the Complaint.

298. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 298 of the Complaint.

299. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 299 of the Complaint.

300. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 300 of the Complaint.

301. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 301 of the Complaint.

302. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 302 of the Complaint.

303. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 303 of the Complaint.

304. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 304 of the Complaint.

305. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 305 of the Complaint.

306. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 306 of the Complaint.

307. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 307 of the Complaint.

308. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 308 of the Complaint.

309. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 309 of the Complaint.

310. Defendant denies the allegations in Paragraph 310 of the Complaint to the extent they state or suggest Defendant participated in the alleged “Venture.” As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

311. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 311 of the Complaint.

312. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 312 of the Complaint.

313. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 313 of the Complaint.

314. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 314 of the Complaint.

315. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 315 of the Complaint.

316. Defendant denies the allegations in Paragraph 316 of the Complaint that it violated the Trafficking Victims Protection Act of 2000, and any amendments to same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

317. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 317 of the Complaint.

318. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 318 of the Complaint.

319. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 319 of the Complaint.

320. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 320 of the Complaint.

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409. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 409 of the Complaint.

410. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 410 of the Complaint.

411. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 411 of the Complaint.

412. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 412 of the Complaint.

413. To the extent the allegations in Paragraph 413 of the Complaint state that Defendant was a member of the alleged “Enterprise” and that Defendant committed “predicate acts,” Defendant denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

414. To the extent the allegations in Paragraph 414 of the Complaint state that Defendant committed “predicate acts,” Defendant denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

415. To the extent the allegations in Paragraph 415 of the Complaint state that Defendant committed “predicate acts” and that Defendant’s alleged “predicate acts” proximately injured Plaintiffs, Defendant denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

416. To the extent the allegations in Paragraph 416 of the Complaint state that Plaintiffs suffered damages by virtue of any act or omission of Defendant, Defendant denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

417. To the extent the allegations in Paragraph 417 of the Complaint state that Defendant committed, or may in the future, commit “predicate acts” or engage in “criminal conduct,” and that Defendant was part of the alleged “Enterprise,” Defendant denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

418. To the extent the allegations in Paragraph 418 of the Complaint state that Defendant committed “predicate acts,” and that Defendant was part of the alleged “Enterprise,”

Defendant denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

419. To the extent the allegations in Paragraph 419 of the Complaint state that Defendant was part of the alleged “Enterprise,” and that Defendant engaged in criminal conduct, Defendant denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

420. To the extent the allegations in Paragraph 420 of the Complaint state that Defendant committed “predicate acts,” and that Defendant was part of the alleged “Enterprise,” Defendant denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

421. To the extent the allegations in Paragraph 421 of the Complaint state that Defendant committed “predicate acts,” and that Defendant was or is part of the alleged “Enterprise,” Defendant denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

422. Paragraph 422 of the Complaint merely incorporates by reference the preceding allegations; accordingly, Defendant incorporates by reference its responses to those preceding allegations.

423. To the extent the allegations in Paragraph 423 of the Complaint state that Defendant recruited, enticed, harbored, transported, obtained, maintained, and/or solicited Plaintiffs, that Defendant used means of force, threats of force, fraud, and coercion to “cause Plaintiffs to engage in commercial sex acts,” and that Defendant was a member of the alleged “Venture,” Defendant denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

424. To the extent the allegations in Paragraph 424 of the Complaint state that Defendant benefitted from a sex-trafficking venture, or that Defendant was a member of any such venture, or that Defendant participated in any such venture, Defendant denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

425. To the extent the allegations in Paragraph 425 of the Complaint state that Defendant violated 18 U.S.C. § 1591(a), and that such violations caused Plaintiffs injury, Defendant denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

426. Paragraph 426 of the Complaint merely incorporates by reference the preceding allegations; accordingly, Defendant incorporates by reference its responses to those preceding allegations.

427. To the extent the allegations in Paragraph 427 of the Complaint state that Defendant “knowingly obtained the labor or services of Plaintiffs” by any of the four improper means listed in said Paragraph, Defendant denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

428. To the extent the allegations in Paragraph 428 of the Complaint state that Defendant benefitted from a labor-trafficking venture, or that Defendant was a member of any such venture, or that Defendant participated in any such venture, Defendant denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

429. To the extent the allegations in Paragraph 429 of the Complaint state that Defendant violated 18 U.S.C. § 1589, and that such violations caused Plaintiffs injury, Defendant

denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

430. Paragraph 430 of the Complaint merely incorporates by reference the preceding allegations; accordingly, Defendant incorporates by reference its responses to those preceding allegations.

431. To the extent the allegations in Paragraph 431 of the Complaint state that Defendant violated 18 U.S.C. § 1962(c), and that such violations caused Plaintiffs injury, Defendant denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

432. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 432 of the Complaint.

433. To the extent the allegations in Paragraph 433 of the Complaint state that Defendant “came together” with other Defendants to form the alleged “Enterprise,” Defendant denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

434. To the extent the allegations in Paragraph 434 of the Complaint state that Defendant was a member of the alleged “Enterprise,” Defendant denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

435. To the extent the allegations in Paragraph 435 of the Complaint state that Defendant was a member of the alleged “Enterprise,” and that Defendant engaged in “illegal acts” and “violations of federal laws,” Defendant denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

436. To the extent the allegations in Paragraph 436 of the Complaint state that Defendant was a member of the alleged “Enterprise,” and that Defendant “relied on the work of Eller and other members of the Enterprise in Texas,” Defendant denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

437. To the extent the allegations in Paragraph 437 of the Complaint state that Defendant engaged in acts constituting “racketeering activities,” Defendant denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

438. To the extent the allegations in Paragraph 438 of the Complaint state that Defendant engaged in “multiple predicate acts amounting to a ‘pattern of racketeering activity,’” Defendant denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

439. To the extent the allegations in Paragraph 439 of the Complaint state that Defendant violated 18 U.S.C. § 1962(c), and that such violations injured Plaintiffs, Defendant denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

440. Paragraph 440 of the Complaint merely incorporates by reference the preceding allegations; accordingly, Defendant incorporates by reference its responses to those preceding allegations.

441. To the extent the allegations in Paragraph 441 of the Complaint state that Defendant violated 18 U.S.C. § 1962(d), and that such violations injured Plaintiffs, Defendant

denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

442. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 442 of the Complaint.

443. To the extent the allegations in Paragraph 443 of the Complaint state that Defendant conspired to violate 18 U.S.C. § 1962(c) by “associating in fact to create” the alleged “Enterprise,” that Defendant “engaged in a pattern of racketeering activity,” and that such activity injured Plaintiffs, Defendant denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

444. To the extent the allegations in Paragraph 444 of the Complaint state that Defendant was, or is, a member of the alleged conspiracy, Defendant denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

445. To the extent the allegations in Paragraph 445 of the Complaint state that Defendant was a member of the alleged conspiracy, that Defendant did, or attempted to, traffic women for purposes of sexual acts and forced labor, and that Defendant engaged in such trafficking for the benefit of itself or anyone else, Defendant denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

446. To the extent the allegations in Paragraph 446 of the Complaint state that Defendant engaged in “predicate acts,” that Defendant was a member of the alleged “Enterprise,” and that Defendant committed “predicate acts” in furtherance of the alleged

conspiracy, Defendant denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

447. To the extent the allegations in Paragraph 447 of the Complaint state that Defendant engaged in predicate acts, and that such acts caused injury to Plaintiffs, Defendant denies same. As to the remaining allegations, Defendant lacks knowledge or information sufficient to form a belief about the truth of same.

448. Defendant denies that Plaintiffs are entitled to recover from Defendant any of the relief requested in the “Prayer” section of the Complaint.

AFFIRMATIVE DEFENSES

Without assuming the burden of proof as to the following, other than the burden imposed on him by law, Defendant alleges his affirmative defenses as follows:

First Affirmative Defense (Failure to State a Claim)

Plaintiffs’ claims are barred, in whole or in part, for failure to state a claim upon which relief can be granted.

Second Affirmative Defense (Statute of Limitations)

Plaintiffs’ claims are barred, in whole or in part, by applicable statutes of limitations.

Third Affirmative Defense (Settlement or Release)

Plaintiffs’ claims are barred, in whole or in part, by settlement and/or release.

Fourth Affirmative Defense (Contributory or Comparative Fault)

Plaintiffs’ claims are barred, in whole or in part, due to acts or omissions of Plaintiffs or third parties over which Defendant has no control and for which Defendant is not legally

responsible. Plaintiffs' recovery, if any, should be barred or proportionately reduced by Plaintiffs and third parties' fault or degree of responsibility.

Fifth Affirmative Defense
(Avoidable Consequences and/or Failure to Mitigate)

Plaintiffs' claims are barred, in whole or in part, pursuant to the doctrines of avoidable consequences and/or failure to mitigate. To the extent Plaintiffs may have suffered any damages, they were required to take reasonable and timely actions to limit their losses which they failed to do.

Sixth Affirmative Defense
(Offset or Setoff)

In the unlikely event that an adverse judgment would be rendered against it, Defendant would respectfully pray for all available credits and/or offsets, including a reduction for amounts received from collateral sources or for any settlement Plaintiffs may have entered with any other party.

Seventh Affirmative Defense
(*In Pari Delicto*)

Plaintiffs' claims are barred in whole or in part by the doctrine of *in pari delicto* because, to the extent any of the alleged conduct occurred, Plaintiffs were knowing and active participants in it and received benefits therefrom. Application of the doctrine here does not interfere with the policy goals of the relevant federal statutes.

Eighth Affirmative Defense
(Res Judicata and Collateral Estoppel)

Plaintiffs' claims are barred, in whole or in part, by the doctrine of res judicata, transactional res judicata, and/or collateral estoppel based on prior litigation between Plaintiffs and some of the Defendants because their present claims arise out of the same transaction or

occurrence that was the subject matter of claims in prior litigation and/or involved the same aggregate of operative facts.

Ninth Affirmative Defense
(Damages Too Speculative and Remote)

Plaintiffs' claims are barred, in whole or in part, because the damages Plaintiffs seek are too speculative and remote and because of the impossibility of the ascertainment and allocation of such alleged damages.

Tenth Affirmative Defense
(Punitive Damages Unconstitutional)

Plaintiffs' requests for punitive damages are barred, in whole or in part, by unconstitutionality. An award of punitive damages against Defendant would violate the U.S. Constitution's Fifth, Sixth, Eighth, and Fourteenth Amendments. *BMW of North America, Inc. v. Gore*, 517 U.S. 559 (1996); *Pacific Mutual Life Insurance Company v. Haslip*, 499 U.S. 1 (1990); *Matthews v. Eldridge*, 424 U.S. 319 (1976).

RESERVATION OF RIGHTS

Defendant reserves the right to amend this Answer to assert additional defenses, affirmative or otherwise, and to assert third-party claims, cross-claims, and counter-claims, all as may be required upon the completion of reasonable discovery and investigation.

DEMAND FOR JURY TRIAL

Pursuant to Federal Rule of Civil Procedure 38, Defendant respectfully demands that a jury be empaneled to try this case.

PRAYER

Defendant RCI Hospitality Holdings, Inc. respectfully prays that the Court, upon final trial or hearing of this case, render judgment that Plaintiffs take nothing on their claims against Defendant, and award Defendant its costs of court and all other appropriate relief.

DATED: December 4, 2023

Respectfully submitted,

/s/ Stephanie Richmond Roark
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Facsimile: (214) 369-2118

**ATTORNEYS FOR DEFENDANT
RCI HOSPITALITY HOLDINGS, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been forwarded to all counsel of record and *pro se* parties in accordance with the applicable Federal Rules of Civil Procedure on December 4, 2023.

/s/ Stephanie Richmond Roark
STEPHANIE RICHMOND ROARK